

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN LECITHIN COMPANY,
LIPOID GmbH, LIPOID, LLC, and
PHOSPHOLIPID GmbH,

Plaintiffs,

-v-

CARSTEN MATTHIAS REBMANN,

Defendant and
Third-Party Plaintiff,

-v-

HERBERT REBMANN, LIPOID STIFTUNG, LIPOID
BETEILIGUNGS GmbH, LIPOID VERWALTUNGS AG,
LIPOID GRUNDSTUECKS GmbH, and PHOSPHOLIPID
FORSCHUNGSZENTRUM e.V.,

Third-Party Defendants.

Case No. 12-cv-00929-VSB

Document Electronically Filed

**NOTICE OF MOTION BY
DEFENDANT FOR SUMMARY
JUDGMENT DISMISSING
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the Amended Complaint, dated April 9, 2012, and the Second Amended Answer, Counterclaims and Third-Party Claims, dated May 15, 2015, previously filed in this action, and the accompanying Affirmation of Samuel Goldman, dated March 1, 2019 and the exhibits thereto, the accompanying Statement Pursuant to Local Rule 56.1, the accompanying memorandum of law, and all prior pleadings, papers and proceedings heretofore had herein, the undersigned hereby moves this Court before the Honorable Vernon S. Broderick, U.S.D.J., in Courtroom 518 at the United States District Case 1:12-cv-00929-VSB-KNF Document 270 Filed 03/01/19 Page 1 of 3 2 Courthouse, 40 Foley Square, New York, New York 10007 for an order (a) pursuant to Fed. R. Civ. P. 56 granting Summary Judgment to Defendant Carsten Matthias Rebmann (“Matthias”) dismissing Plaintiffs’ amended complaint with prejudice, and granting Matthias such other and further relief as this Court may deem just and proper. In the alternative, granting Matthias an order in the Court’s exercise of its equitable powers, directing Plaintiffs to accept the Domain Names which are the subject of this action and reimbursing Matthias for the

expenses he incurred in registering and maintaining these Domain Names; and

Granting such other and further relief as to the Court seems just and proper.

Date: March 21, 2014

Respectfully submitted,

SAMUEL GOLDMAN & ASSOCIATES

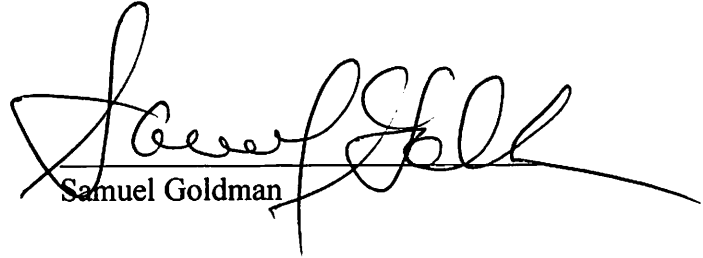
A handwritten signature in black ink, appearing to read 'Samuel Goldman', is written over a horizontal line. The signature is fluid and cursive.

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CERTIFICATE OF SERVICE

I, Samuel Goldman, am an attorney at Samuel Goldman & Associates and am counsel for the Defendant and Third-Party Plaintiff, in the above-captioned proceeding. I hereby certify that on March 1, 2019, I caused the foregoing Notice of Motion for Partial Summary Judgement to be served electronically via the United States District Court, Southern District of New York Court's ECF system upon those parties entitled to receive electronic notice.



Samuel Goldman